

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

J-SQUARED TECHNOLOGIES, INC., a)
Canadian corporation, and J-SQUARE)
TECHNOLOGIES (OREGON) INC., an)
Oregon corporation,)
Plaintiffs,)
v.) C.A. No. 04-CV-960-SLR
MOTOROLA, INC., a Delaware corporation.)
Defendant.)

**EXHIBIT I TO
MOTOROLA'S RESPONSE TO PLAINTIFFS'
MOTION FOR PROTECTIVE ORDER**

YOUNG CONAWAY STARGATT & TAYLOR, LLP

/s/ William W. Bowser

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Cates, Emily

From: Bellew, Sean [SBellew@cozen.com]
Sent: Thursday, April 06, 2006 9:40 AM
To: Papetti, Randy
Cc: Cates, Emily; Talbot, Cory; Berry, Kevin F.; Felice, David A.
Subject: GE Fanuc
Attachments: Adeb0d88c-19a6-4750-98cd-2ac271bdaf81.PDF

Randy:

I attach a copy of the GE Fanuc subpoena that Motorola apparently served on March 27, 2006. Is there a reason why we were not provided a copy of this subpoena until 8 days after you served it?

Please be advised that we intend to file a motion to quash this subpoena unless we can agree on the proper scope of production.

1. We have no objection to the production of contracts between JST/JSO and GE Fanuc that existed prior to Motorola's termination of the Agreements on 2/26/04. These are the only contracts that could be relevant, and we believe there are none. Any contracts after that, as well as any contract dated at any time with the North Carolina entity, are completely irrelevant.

2. We have no objection to this request provided that (1) the end date for the requested time period is 2/26/04 and (2) no documents are requested from the NC entity. Any communications after that point are completely irrelevant to this action as are all documents related to the NC entity.

3. Again, we have no objection to this request to the extent that the cut off date for the request is 2/26/04 and it does not involve the NC entity.

I would appreciate your prompt response. Additionally, if you have made contact with a representative of GE Fanuc, I would appreciate your providing me that person's name and contact information. Thank you.

Sean J. Bellew, Esquire
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